

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20054

In re the complaint of Beehive
Telephone re Bellcore's
administration of the 800 data
base.

Docket IC-93-10820
Docket 93-129

To: Common Carrier Bureau's Kathie Knoff

These comments are offered by Beehive relative to the Nov 15th response made to you by Bellcore from our complaint about charges for storing our 800 numbers in their data base. **DEC 31 1993**
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1. It must be noted throughout all this verbage, that no where can we find any reference in the meetings or documents related the Commission giving Bellcore the responsibility to make a data base, that companies like Beehive were to be charged for participation. Zero. Nothing. No notice. You'd of heard from us earlier had this been advocated.

2. With this in mind, we don't have much argument with their statement about our complaint. And, they are right we have not made any payment which we understand from the threats of Bellcore folk, is going up at a rate of seven point eight grand per month (\$7,800.)

3. We were never served with notice of the tariffs Bellcore tariffs. Had we been so notified, we would have challenged them and asked for formal hearings to justify the arbitrary and capricious rates and heavy handed way they are administered. Note: Bellcore disclaims they are their tariffs, but do say they are BOC tariffs. Bellcore admits they are owned by the BOC's. So, they are Bellcore tariffs.

4. We were much interested in the Bellcore quibble over changes to the Beehive data. They say we changed 2. They also say somebody else grabbed 4. Who? We know for a fact that we get numerous requests for assigned numbers when in fact those users did not request release. Does Bellcore transfer numbers without our consent? There statements that no fees are charged for movement of data shows how badly the system is designed. There should be no charge except for movement and costs of the system should be apportioned as a matter of total network costs, not the numbers assigned. Does that mean we can file a tariff charging say a dollar a line for every telephone customer we have. Whom do we charge? Bellcore? Do we cut off access to our customers from BOC customers if they don't pay? Or are we go "give up" all the unused codes of our exchanges which have less than 10,000 lines? That would make for an interesting and very expensive data base and would of course really make the BOC's some real money.

5. The summation of the Bellcore answer is a santimonious statement that they filed a tariff, and the Commission accepted it.

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so tough stuff Beehive, "we" (the BOC's) gonna get your 800 codes cause you don't market them the same way we do. They charge and get money from their 800 use, but we don't get that revenues as we pointed out in my second comments to the Commission in this matter.

6. In summary, we are a rape victim of the BOC's via their Bellcore. Their entire data base system was created with the consent of the FCC by their spending millions of rate payer dollars for a system mandated by the Commission. No mention of charge was proposed nor advocated and our data in their base is for their convenience for which they should pay, not us. If payment is desired it should be as a function of a query charge and not a charge for information stored in an over expensive system that was created at the expense of the ratepayer with zero formal commission oversight as to its costs or how it was to be paid for.

Wherefore Beehive respectfully requests it order Bellcore to not terminate Beehive data, and to consult with and modify its rates and costs in a fashion we would be willing to concur with (and we will meet with the Commission and Bellcore as they suggest if the Commission would be willing to arrange this as either a formal or informal proceeding). In short, leave the status quo and don't let these guys be so bossy with their AT&T like attitude that stomps we little guys. We need your help on this one. Of course, a letter allowing us to include these costs on our cost studies to be charged as network expense which would then partly flow to the High Cost Fund would be an acceptable solution. That would be cheaper for BOC's than re-writing the tariffs.

Submitted this 29th day of November, 1993

Arthur W. Brothers

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